

Fill in this information to identify the case:

Debtor 1 Anthony Drozdowski

Debtor 2 Deborah Drozdowski
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 18-12660 MDC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: FREEDOM MORTGAGE CORPORATION

Court claim no. (if known): 7-2

Last 4 digits of any number you use to identify the debtor's account: 4864

Property address:

478 Pheasant Lane
Fairless Hills, PA 19030-3708

Part 2: Prepetition Default Payments

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ _____

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ 2,937.50

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ 0.00

c. **Total.** Add lines a and b. (c) \$ 2,937.50

Creditor asserts that the debtor(s) are contractually obligated for 04 / 01 / 2023
the postpetition payment(s) that first became due on:

Debtor(s) Anthony Drozdowski and Deborah Drozdowski
First Name Middle Name Last Name

Case Number (if known): 18-12660 MDC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Michael Farrington

Date 05/16/2023

Michael Farrington
16 May 2023, 16:33:40, EDT

KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor

Loan #	
BK Case #	1812660
Name	Drozdzowski
BK Filed	4/20/2018

Date Received	Contractual Due Date	Post Petition Due Date	Pre	Payment Amount	Amount Due	Difference	Post Suspense	Pre Suspense	Fees	Contractual from Pre	Comments	Principal	Interest	Principal Balance
	LOAN MOD	BOARDED		\$ 7,806.98			\$ 7,806.98	\$ 7,806.98	\$ -		Balance at Filing			\$ -
6/1/2020		3/1/2020			\$ 1,806.97	\$ (1,806.97)	\$ 6,000.01	\$ -						\$ -
6/1/2020		4/1/2020			\$ 1,806.97	\$ (1,806.97)	\$ 4,193.04	\$ -						\$ -
6/1/2020		5/1/2020			\$ 1,806.97	\$ (1,806.97)	\$ 2,386.07	\$ -						\$ -
6/1/2020		6/1/2020			\$ 1,806.97	\$ (1,806.97)	\$ 579.10	\$ -						\$ -
6/3/2020		7/1/2020		\$ 1,806.97	\$ 1,809.56	\$ (2.59)	\$ 576.51	\$ -						\$ -
7/1/2020		8/1/2020		\$ 1,809.56	\$ 1,809.56	\$ -	\$ 576.51	\$ -						\$ -
8/6/2020		9/1/2020		\$ 1,806.97	\$ 1,809.56	\$ (2.59)	\$ 573.92	\$ -						\$ -
9/10/2020		10/1/2020		\$ 1,809.56	\$ 1,809.56	\$ -	\$ 573.92	\$ -						\$ -
10/6/2020		11/1/2020		\$ 1,809.56	\$ 1,809.56	\$ -	\$ 573.92	\$ -						\$ -
11/5/2020		12/1/2020		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 573.92	\$ -						\$ -
1/11/2021		1/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 573.92	\$ -						\$ -
2/5/2021						\$ -	\$ 573.92	\$ -						\$ -
2/22/2021		2/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 573.92	\$ -						\$ -
3/19/2021		3/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 573.92	\$ -						\$ -
4/16/2021		4/1/2021		\$ 1,839.42	\$ 1,811.84	\$ 27.58	\$ 601.50	\$ -						\$ -
4/16/2021						\$ -	\$ 601.50	\$ -						\$ -
6/15/2021		5/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
7/14/2021		6/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
8/19/2021		7/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
9/16/2021		8/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
10/22/2021		9/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
11/16/2021		10/1/2021		\$ 1,811.84	\$ 1,811.84	\$ -	\$ 601.50	\$ -						\$ -
12/22/2021		11/1/2021		\$ 2,047.57	\$ 1,811.84	\$ 235.73	\$ 837.23	\$ -						\$ -
1/28/2022		12/1/2021		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
2/24/2022		1/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
3/23/2022		2/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
4/20/2022		3/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
5/20/2022		4/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
6/23/2022		5/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
7/29/2022		6/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
8/26/2022		7/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
9/23/2022		8/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
10/24/2022		9/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
11/25/2022		10/1/2022		\$ 2,047.57	\$ 2,047.57	\$ -	\$ 837.23	\$ -						\$ -
12/21/2022		11/1/2022		\$ 1,727.36	\$ 2,047.57	\$ (320.21)	\$ 517.02	\$ -						\$ -
1/24/2023		12/1/2022		\$ 1,727.36	\$ 1,727.36	\$ -	\$ 517.02	\$ -						\$ -
2/23/2023		1/1/2023		\$ 1,727.56	\$ 1,727.36	\$ 0.20	\$ 517.22	\$ -						\$ -
3/30/2023		2/1/2023		\$ 1,727.36	\$ 1,727.36	\$ -	\$ 517.22	\$ -						\$ -
4/27/2023		3/1/2023		\$ 1,727.36	\$ 1,727.36	\$ -	\$ 517.22	\$ -						\$ -

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Anthony Drozdowski
Deborah Drozdowski**

Debtor(s)

**FREEDOM MORTGAGE
CORPORATION**

Movant

vs.

**Anthony Drozdowski
Deborah Drozdowski**

Debtor(s)

Kenneth E. West,

Trustee

BK NO. 18-12660 MDC

Chapter 13

Related to Claim No. 7-2

**CERTIFICATE OF SERVICE
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Michael P. Farrington of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on May 16, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Anthony Drozdowski
478 Pheasant Lane
Fairless Hills, PA 19030-3708

Deborah Drozdowski
478 Pheasant Lane
Fairless Hills, PA 19030-3708

Attorney for Debtor(s) (via ECF)

Michael P. Kelly, Esq.
Cowan & Kelly
202 Penns Square
Langhorne, PA 19047

Trustee (via ECF)

Kenneth E. West Esq.
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: May 16, 2023

/s/ Michael P. Farrington

Michael P. Farrington, Esquire
Attorney I.D. 329636
KML Law Group, P.C.
BNY Mellon Independence Center
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215-627-1322
mfarrington@kmlawgroup.com